

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



March 5, 2013

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Widely Attended Gathering Determination Regarding Attendance by NASA Employees at a Reception and Global Education Gala hosted by the World Affairs Council of Washington, D.C. on March 7,

On March 7, 2013, the World Affairs Council of Washington, D.C. will host a gala reception and dinner at the Ritz-Carlton Hotel from 6:00 p.m. to 9 p.m. The World Affairs Council of D.C. is a non-profit organization under Section 501(c)(3). The event will be attended by representatives from education, academia, industry, the media, and the general public. Approximately 900 are expected to attend. The cost of an individual ticket to the event is \$250.00 per person. The World Affairs Council controls the invitations of guests and their seating. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs and operations. Attendance at the dinner and reception will allow NASA representatives to exchange views and ideas with others in attendance, many of whom hold leadership roles in education, academia, and industry. Attendance will give NASA employees who are invited the opportunity to share information on NASA's policies and plans, including NASA's education initiatives, with other guests. Accordingly, NASA employees and their invited guest whose duties do not substantially affect the World Affairs Council of D.C. – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – may accept an invitation for free attendance to the dinner and reception.

In addition, some NASA invitees may also receive an invitation to attend a VIP reception for approximately 100 attendees who are distinguished leaders in their fields, including from industry, academia, education and government service. The average value of refreshments served to each attendee will be approximately \$150. This determination covers attendance at the VIP reception to those NASA employees and their guests who are invited.

Moreover, NASA employees whose duties may substantially affect the World Affairs Council, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone